

KEWEENAW BAY INDIAN COMMUNITY

2009 TRIBAL COUNCIL

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August 26, 2009

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Bharat Mathur
Acting Regional Administrator Region 5
U. S. Environmental Protection Agency
77 West Jackson Boulevard (R-19J)
Chicago, Illinois 60604

Re: Humboldt Mill Ore Processing Facility, Marquette County, Michigan ("Humboldt Mill")

Dear Mr. Mathur:

In accordance with the U.S. EPA Indian Policy, we are requesting assistance from U.S. EPA Region 5 for an evaluation of the current environmental conditions of a former ore processing facility and the regulatory and permitting framework that would govern a proposal recently submitted by Kennecott Eagle Minerals Company ("Kennecott"), to renovate and reuse this facility to process metallic sulfide ore and dispose of process wastes into an onsite lake. Background information and additional details regarding our request are provided below.

Kennecott has proposed development of a metallic sulfide mine in the headwaters area of the Yellow Dog and Salmon Trout Rivers on the Yellow Dog Plains of northwest Marquette County Michigan. Permitting and other issues related to this proposed mine are in litigation or contested case proceedings and the mining project has not started. Recently, Kennecott submitted an application to the Michigan Department of Environmental Quality (MDEQ) for the renovation of the Humboldt Mill for processing and beneficiation of metallic sulfide ore from its proposed Eagle Mine on the Yellow Dog Plains. Humboldt Mining Permit Application http://www.michigan.gov/deq/0,1607,7-135-3311_4111_18442-205490--,00.html

Kennecott has also announced that they are exploring at least six other metallic sulfide ore deposits in the area and that the Humboldt Mill could be used to serve multiple mines developed throughout the western Upper Peninsula region. This would extend the life of the Humboldt Mill ore processing and waste disposal facility well beyond the life of the proposed Eagle Mine. As a result, the Humboldt Mill, which is located 23 miles from the reservation of the Keweenaw Bay Indian Community (Community) and within the Community's ceded territory, may be operating for decades. Accordingly, the Community is extremely concerned about the consequences that the proposed new operation of the Humboldt Mill will have on the environment and human health in the surrounding area.

The Humboldt Mill was originally an iron ore processing facility which operated to serve the adjacent Humboldt Iron Mine and nearby Republic Mine from 1954 to 1979. In the early 1980's, the Humboldt Mill was refurbished to process gold ore from the nearby Ropes Gold

LAKE SUPERIOR BAND OF CHIPPEWA INDIANS

Mine and operated from 1985 to 1989 when the Ropes Gold Mine closed. The Ropes Gold Mine ore contained metallic sulfide minerals. It has been documented in numerous environmental studies of the site that waste materials, processed ore, metal sulfides, and processing chemicals were improperly disposed of on the Humboldt Mill property. 1.8 million tons of waste was deposited into an onsite lake during the years of Ropes Gold Mine ore processing. Previous owners of the site have submitted several Remedial Action Plans to the MDEQ to achieve cleanup and "closure" of the site but to our knowledge, these plans were never carried out and the site remains "open" and unremediated.

Kennecott purchased the Humboldt Mill site in September 2008. Pursuant to Michigan law, "An owner or operator of property ... who has reason to believe that a hazardous substance is emanating from, has emanated from, or is likely to be emanating from the property and migrating beyond the boundaries of the property that he or she owns or operates..." must file a *NOTICE OF MIGRATION OF CONTAMINATION* (pg 1, Notice of Migration of Contamination form). As new owner of the Humboldt Mill site, Kennecott filed this Notice March 26, 2009 (see attached *NOTICE OF MIGRATION OF CONTAMINATION*).

In the Notice, Kennecott states "Even though inorganic substances are relatively immobile in the natural environment, the potential for these substances to migrate off-site appears to be high due to the fact that the soils on and around the mill property are well-drained sands and gravels with a very high to high hydraulic conductivity and low water holding capacity. Furthermore, a subset of the inorganic compounds ... have been detected at concentrations greater than groundwater-surface water criteria (GSI) in off-site wells considered downgradient (northwest) of the Humboldt Mill property...." (See pg 3, Kennecott's Notice of Migration of Contamination.) The Notice goes on to list 25 hazardous substances which have migrated, or are likely to migrate, beyond the boundary of the Humboldt Mill site at concentrations that exceed cleanup criteria. This list of contaminants includes 17 metals and 6 organic compounds plus sulfate and cyanide. All 25 contaminants have been found in the groundwater and all contaminants are listed as migrating northwest through the aquifer to the disposal lake which drains to the adjacent wetlands and the nearby Middle Branch of the Escanaba River.

In regards to the proposed renovation of the Humboldt Mill as a future ore processing facility, as described by Kennecott Humboldt Mining Permit Application, we have a number of concerns.

-- It is not clear that this is an appropriate regulatory structure or permitting structure to govern Kennecott's proposed use of the facility as an ore processing plant and a waste disposal facility. Elements included within Kennecott's proposed future use plan include:

- grinding and crushing of high-grade metal sulfide ore from the Eagle Mine followed by point source discharge of 2.5 million tonnes of tailings containing heavy metals and processing chemicals into an onsite lake. Bench scale flotation tests indicate that up to 25% of the copper and 40% of the nickel will remain in the silt-sized tailings when disposed into the lake.
- operation of a water treatment plant to treat industrial waste water and discharge of these waste waters into adjacent wetlands.
- discharge of storm water runoff and industrial contact water from a severely impacted site directly to the environment

Kennecott's proposed operation of the Humboldt Mill, with even greater adverse consequences to the environment and human health in the surrounding area, than is being caused by the existing condition of the Humboldt Mill.

Accordingly, we request your assistance with an evaluation of the existing data and information about the current environmental condition of the Humboldt Mill to identify potential or existing risks or imminent threats to human health and the environment due to current environmental conditions at the site. Kennecott recently submitted a Baseline Environmental Assessment supported by six-volumes of Phase I and Phase II Environmental Site Assessment (ESA) reports to the Michigan Department of Environmental Quality. We do not currently have the staff capacity or technical expertise to review this volume of technical material. In our cursory review, we noticed that while Kennecott has characterized the mill site in detail, the Phase II ESA does not characterize the lake they are proposing to use for waste disposal.

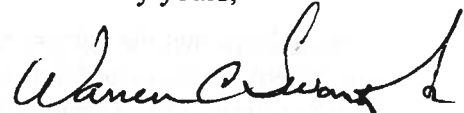
In addition, given the complexity of the issues and the complexity of Kennecott's proposal to renovate this ore processing facility, we are in need of the technical expertise of the U.S. EPA to ensure that the proper regulatory framework is adhered to, the proper permitting requirements are followed, and human health and the environment will be protected should ore processing be allowed at the Humboldt Mill.

We would like to meet with you or your representatives in the very near future to further discuss these issues.

Please contact Todd Warner, Director of our Natural Resources Department, if you have any questions or require any additional information regarding the foregoing request, and for the purpose of setting a date and time for the requested meeting.

Thank you in advance for your cooperation and assistance.

Sincerely yours,



Warren C. Swartz, Jr.
President

Attachment: *NOTICE OF MIGRATION OF CONTAMINATION*, March 26, 2009

cc. Barry Breen
Charles Reddoor
Steve Hoffman
Tinka Hyde
Luke Jones
Jennifer Manville

Principal Deputy Assistant Administrator for the Office of
Solid Waste and Emergency Response
Office of Solid Waste Tribal Coordinator
Mining Coordinator, Office of Solid Waste
Director, Water Division, Region 5
Director, Indian Environmental Office, Region 5
Michigan Tribal Liaison

-- It should be noted that Kennecott refers to the lake into which they propose to dispose of the tailings from the processing facility as the Humboldt Tailings Disposal Facility (HTDF). Kennecott further states that they will be re-commissioning this decommissioned waste disposal facility. We are unable to verify that this lake is classified or licensed as a waste disposal facility and it is not clear as to the legality of using a lake as a disposal facility under current federal clean water, industrial waste disposal, or other federal laws and regulations. The lake targeted for waste disposal currently hosts and supports both benthic and aquatic organisms, including a number of fish species and is hydrologically connected to adjacent wetlands and surface waters.

-- Kennecott has indicated they will conduct some environmental remediation at the property after they receive their permits to operate the Humboldt Mill as an ore processing facility. They have not, however, identified the specifics of these activities. The State of Michigan has not indicated if they will require any environmental remediation of the current conditions of the Humboldt Mill. Despite the long list of contaminants Kennecott has documented as migrating or likely to migrate off site, they apparently do not intend to remediate these conditions. Kennecott states in the Humboldt Mining Permit Application that: "The goal of the reclamation plan is to retain a site condition that is consistent with the industrial setting prior to KEMC operations." (See pg. 38, Section 6, paragraph 1, of the Permit Application.) and further that, "The final land use of the reclaimed areas at the Humboldt Mill site will remain as restricted industrial use consistent with pre-KEMC acquisition of the facility." (See pg. 39, Section 6.2, paragraph 1, of the Permit Application.). These statements indicate that Kennecott intends to add 2.5 million tonnes of metal sulfide waste to the onsite lake and then leave the mill site as they found it despite the off-site migration of many contaminants before they even begin their operations.

-- The Humboldt Mill is located approximately 25 miles south of Kennecott's proposed Eagle mine, in Marquette County, Michigan, within the Escanaba River watershed. The Escanaba River watershed is one of the Upper Peninsula's largest watersheds. Water from the Humboldt Mill site and disposal lake discharge through wetlands into the middle branch of the Escanaba River, which ultimately discharges into Lake Michigan. The Escanaba River watershed already has a number of fish advisories.

-- We believe that the current conditions of the Humboldt Mill pose a risk to human health and the environment and that the site would likely score high enough on the EPA Hazard Ranking System for potential listing as a Superfund site. The Humboldt Mill is identified as a potential contaminant source (PCS) for the city of Marquette in their Source Water Protection Plan (SWPP). The nearby cities of Negaunee and Ishpeming, the closest municipal water systems, do not have completed SWPP's for their water supply. Water supply for Humboldt Township, in which the Humboldt Mill property is located, and Champion Township, which is the township immediately west of Humboldt, is through private wells some of which have been impacted by past Humboldt activities. Private wells in this area draw water from the Second Creek-Middle Branch Escanaba River Aquifer, which is the aquifer located beneath the Humboldt Mill property.

In summary, the current conditions of the Humboldt Mill will, based upon the information contained in Kennecott's Humboldt Mining Permit Application, be greatly exacerbated by



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
REMEDIALTION AND REDEVELOPMENT DIVISION

For DEQ Use Only
ITS # <u>2009520003</u>
Site ID # <u>5200065</u>
Category Code: _____

NOTICE OF MIGRATION OF CONTAMINATION

(Under the authority of Part 201, Natural Resources and Environmental Protection Act, 1994 Act 451, as amended, (NREPA) and the Rules promulgated thereunder)

An owner or operator of property that is a facility, and/or who is subject to MCL 324.20114, and who has reason to believe that a hazardous substance is emanating from, has emanated from, or is likely to be emanating from the property and migrating beyond the boundaries of the property that he or she owns or operates is required under R 299.5522 and R 299.51017(1) to notify the Michigan Department of Environmental Quality ("DEQ") and affected property owners, unless he or she is exempt from MCL 324.20107a (see MCL 324.20107a(4) for exemptions), or unless he or she has provided the notice required by MCL 324.21309a. Submission of this notice does not fulfill the notification requirements of MCL 324.21309a.

The notice must be provided within 45 days after the owner or operator has reason to believe that hazardous substances have migrated, or are likely to have migrated, to or beyond the boundary of his or her property (see R 299.51017 and R 299.5522 for exceptions). If a person is required to provide additional notice as a result of the changes in R 299.51017 that took effect on December 21, 2002, then that additional notice shall be provided not later than September 21, 2003.

Use of this form is mandatory for the notice required by R 299.51017(1) and may also be used by parties subject to MCL 324.20114 to provide notice required by R 299.5522. This form may also be used to provide notice to affected property owners as required by those rules.

If a person holds a permit for an oil and gas well under Part 615, Supervisor of Wells, of the NREPA and there is a release from the oil and gas exploration or production activities, that person shall give notice to the DEQ and to the owner of the surface rights of the property.

If a person holds an easement and there is a release from the easement holder's activities, that person shall provide notice to the DEQ and to the grantor of the easement, or the grantor's successor in interest, if any.

Completing this notice in no way relieves a person who is subject to MCL 324.20114 from the responsibility to undertake required response activities.

This notice must be sent to the DEQ office that serves the county in which the property is located. A list of DEQ offices is available at www.michigan.gov/bea, or by calling the Remediation and Redevelopment's Lansing office at 517-373-9837. The DEQ will not prepare acknowledgement of receipt of these notices. The sender is responsible for sending the report using a method that provides proof of delivery if such proof is desired. Please label the outside of the envelope "Migration Notice." Additional guidelines for the compliance with the requirements of R 200.51017(1) or R 299.5522 are available at www.michigan.gov/bea.

THIS NOTICE IS PROVIDED PURSUANT TO:
(check both, if applicable)

R 299.5522

☐

R 299.51017

☒

Please provide the following information as completely as possible.

1. Name and location of the property that hazardous substances are emanating from:

Name: Humboldt Mill

Address: 4547 County Road 601

Location:

City/County: Champion/Marquette

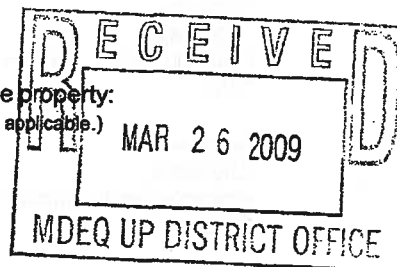
Property Tax Identification Number, or if applicable, the ward and item number: 52-06-211-001-20

2. Status relative to the property:
(Check one or both, as applicable.)

Owner

☒

Operator

☒

Provide any additional ID numbers associated with the property (e.g., EPA ID No., BEA No., Part 213 facility ID No., etc.):

3. Name, address, and telephone number of the property owner, operator, or other party submitting the notice:

Name: Kennecott Eagle Land, LLC
Address: 504 Spruce Street
City/State: Ishpeming, Michigan 49849
Telephone number: 906-486-1257

4. Name, address and telephone number of a contact person familiar with the content of the notice:

Name: Jonathan C. Cherry
Address: 504 Spruce Street
City/State: Ishpeming, Michigan 49849
Telephone: 906-486-1257

5. If this Notice is provided pursuant to R 299.51017, provide the address and other location information for the *adjacent* property(s) onto which contamination is migrating, has migrated, or is likely to migrate. If this Notice is provided pursuant to R 299.5522, provide the address and other location information for *each* property onto which contamination has migrated. Notice should be sent to the property owner of record. If the impacted property is owned by the State of Michigan, notice should be sent to the department managing the property (i.e. a prison, state park, etc.). Notices to the Michigan Department of Transportation (MDOT) for state owned roadways should be sent to Ms. Heather Hicks, MDOT-Bureau of Transportation Planning, 425 W. Ottawa Street, P.O. Box 30050, Lansing, MI 48989. If it isn't readily apparent what state department manages the property, notices should be sent to Mr. Thomas Saxton, Tenant and Land Services, Department of Management and Budget, 1st Floor Lewis-Cass Building, P.O. Box 30026, Lansing, MI 48909.

Address: PO Box 1
City/State: Coeur D'alene, ID 83814
Property Tax ID number: 52-06-211-001-10
Other: Callahan Mining Corp.

Notified? No ☐ Yes ☐ Date:

Address: 110 Airport Road
City/State: Negaunee, MI 49866
Property Tax ID number: 52-06-211-001-00
Other: O'Dovero Properties

Notified? No ☐ Yes ☐ Date:

Address: 110 Airport Road
City/State: Negaunee, MI 49866
Property Tax ID number: 52-06-211-003-00
Other: O'Dovero Properties

Notified? No ☐ Yes ☐ Date:

Address: 110 Airport Road
City/State: Negaunee, MI 49866
Property Tax ID number: 52-06-211-002-00
Other: O'Dovero Properties

Notified? No ☐ Yes ☐ Date:

Address:
City/State:
Property Tax ID number:
Other:

Notified? No ☐ Yes ☐ Date:

Address:
City/State:
Property Tax ID number:
Other:

Notified? No ☐ Yes ☐ Date:

(Attach additional pages as needed)

6. Complete the Table on Page 3 of this Form for each hazardous substance which has migrated, or is likely to have migrated, beyond the property boundary at a concentration that exceeds a Generic Residential Cleanup Criterion developed by the DEQ pursuant to MCL 324.20120a(1). Complete and attach additional copies of Page 3, if necessary, to list all hazardous substances that must be reported. Include a scaled map or drawing that shows the location of sampling points identified on the Table on Page 3, the property boundaries, and the adjacent property owners if providing notice pursuant to R 299.1017(1) or all impacted property owners if providing notice pursuant to Rule 299.5522.
7. Provide a summary of the information which shows that contamination is emanating from, or has emanated from, and is present beyond the boundary of the source property at a concentration which exceeds that allowed by MCL 324.20120a(1)(a). This summary shall identify the environmental media affected, specific hazardous substances, and the concentrations of those hazardous substances in all affected environmental media at the property boundary and in any sample locations beyond the property boundary. The summary shall also describe the basis for the conclusion that the contamination is emanating, has emanated, or is present beyond the boundary of the source property, including whether the conclusion is based on groundwater analytical data or fate and transport modeling, both, or neither.

The hazardous substances listed on the Table on Page 3 include all of the substances detected above Generic Residential Cleanup Criteria on the site. Even though inorganic substances are relatively immobile in the natural environment, the potential for these substances to migrate off-site appears to be high due to the fact that the soils on and around the mill property are well-drained sands and gravels with a very high to high hydraulic conductivity and low water holding capacity. Furthermore, a subset of the inorganic compounds presented on Table 3 (beryllium, cadmium, iron, lead, manganese, nickel and sulfate) have been detected at concentrations greater than groundwater/surface water criteria (GSI) in off-site wells considered downgradient (northwest) of the Humboldt Mill property (MW-7, MW-105 and PW-2).

8. If the person making this notice has reason to believe that a migrating hazardous substance has affected, or is likely to affect, a private or public water supply, then that water supply must be identified here:
- | | YES | NO |
|---|-------------------------------------|---|
| 9. Is this notice being submitted within the timeframes established under 299.51017, as applicable? | <input type="checkbox"/> | <input checked="" type="checkbox"/> R 299.5522 and/or R |
| 10. Is this notice in addition to a notice submitted prior to <i>December 21, 2002</i> ? (R 299.51017(4)(c)) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 11. Is this notice related to an oil and gas well permit (R 299.51017(2))? Permit #: | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 12. Is this notice related to an easement (R 299.51017(3))? (NOTE: All easement grantors <i>must</i> receive this notice.) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 13. Has surface water been affected (R 299.51017(1) and R 299.5522(2))? (If yes, please identify the affected surface water body.)
Humboldt Tailings Disposal Facility (HTDF) and possibly wetland | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

CERTIFICATION:

With my signature below, I certify that I am the owner of the facility or that I am legally authorized to execute this notice on behalf of the owner or operator named on this form, and that to the best of my knowledge and belief the above representations are complete and accurate. I understand that intentionally submitting false information to the DEQ is a felony and may result in fines up to \$25,000 for each violation.

Signature



Date 3/25/2009

(Owner or person legally authorized to bind the person making this report)

Name (Typed or Printed)

Jonathan C. Cherry

Title (Typed or Printed)

General Manager

See Item 6 on Page 2 of this Form for instructions to be used in completing this Table. Attach additional pages if necessary. The information to be included in each column of the Table is:

- Column A Name of hazardous substance.
 Column B Chemical Abstract Service (CAS) Number for the hazardous substance.
 Column C Maximum hazardous substance concentration measured on the property, expressed in parts per billion (e.g., ug/L or ug/Kg). Report maximum concentration separately for each environmental medium.
 Column D Sample location for Column C (relate to label on map).
 Column E Environmental medium in which concentration reported in Column C was measured (e.g., soil or groundwater).
 Column F Distance from point of maximum measured concentration (Column D) to property boundary, in direction of contaminant migration, if direction is known or can reasonably be inferred. If direction is unknown, list distance to nearest property boundary.
 Column G Direction of contaminant migration, if known.
 Column H Concentration closest to property boundary, if known. If a concentration lower than the maximum concentration reported in Column C has been measured at a point closer to the property boundary in the direction of contaminant migration, use Column I to list the concentration that was measured closest to the property boundary in the direction of contaminant migration.
 Column I Sample location for Column H (relate to label on map).
 Column J Environmental medium for measurement reported in Column H, if applicable.

A Hazardous Substance	B CAS Number	C Maximum Concentration	D Sample Location for "C"	E Environmental Medium for "C"	F Distance to Property Boundary	G Direction of Migration	H Boundary Concentration	I Sample Location for "H"	J Environmental Medium for "H"
Aluminum	7429905	320,000	MW-102	Groundwater	1200 feet	NW	1100	KMW-6A	Groundwater
Antimony	7440360	16	MW-102	Groundwater	1200 feet	NW	ND	KMW-6A	Groundwater
Arsenic	7440382	891	MW-102	Groundwater	1200 feet	NW	30	KMW-6A	Groundwater
Beryllium	7440417	43	MW-102	Groundwater	1200 feet	NW	ND	KMW-6A	Groundwater
Cadmium	7440439	67	MW-102	Groundwater	1200 feet	NW	ND	KMW-6A	Groundwater
Chromium, total	16065831	4,330	MW-102	Groundwater	1200 feet	NW	10	KMW-6A	Groundwater

Total Number Samples Collected:

63 (since 2005)

Total Number of Samples Exceeding Criteria:

52 (since 2005)

A scaled map or drawing showing these locations and the property boundaries must be submitted with this Notice

See Item 6 on Page 2 of this Form for instructions to be used in completing this Table. Attach additional pages if necessary. The information to be included in each column of the Table is:

- Column A Name of hazardous substance.
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 Column I Sample location for Column H (relate to label on map).
 Column J Environmental medium for measurement reported in Column H, if applicable.

A Hazardous Substance	B CAS Number	C Maximum Concentration	D Sample Location for "C"	E Environmental Medium for "C"	F Distance to Property Boundary	G Direction of Migration	H Boundary Concentration	I Sample Location for "H"	J Environmental Medium for "H"
Cobalt	7440484	4,940	MW-102	Groundwater	1200 feet	NW	15	KMW-5A	Groundwater
Copper	7440508	11,000	MW-102	Groundwater	1200 feet	NW	42	KMW-5A	Groundwater
Cyanide	57125	17	KMW-5	Groundwater	300 feet	NW	17	KMW-5	Groundwater
Iron	7439896	3,830,000	MW-102	Groundwater	1200 feet	NW	81000	KMW-5A	Groundwater
Lead	7439921	58.5	MW-11	Groundwater	30 feet	NW	58.5	MW-11	Groundwater
Lithium	7439932	310	MW-102	Groundwater	1200 feet	NW	151	KMW-5A	Groundwater

Total Number Samples Collected: 63 (since 2005)

Total Number of Samples Exceeding Criteria: 52 (since 2005)

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A Hazardous Substance	B CAS Number	C Maximum Concentration	D Sample Location for "C"	E Environmental Medium for "C"	F Distance to Property Boundary	G Direction of Migration	H Boundary Concentration	I Sample Location for "H"	J Environmental Medium for "H"
Manganese	7439965	22,000	KMW-6A	Groundwater	500 feet	NW	22,000	KMW-6A	Groundwater
Mercury	Varies	0.114	MW-102	Groundwater	1200 feet	NW	0.001	KMW-6A	Groundwater
Nickel	7440020	13,000	MW-102	Groundwater	1200 feet	NW	53	KMW-6A	Groundwater
Selenium	7782492	11.2	MW-102	Groundwater	1200 feet	NW	0.31	KMW-6A	Groundwater
Silver	7440224	2.7	MW-102	Groundwater	1200 feet	NW	ND	KMW-6A	Groundwater
Sulfate	14808798	940,000	MW-11	Groundwater	500 feet	NW	15,000	MW-12	Groundwater
Zinc	7440666	8,520	MW-102	Groundwater	1200 feet	NW	10	KMW-6A	Groundwater

Total Number Samples Collected: 63 (since 2005)

Total Number of Samples Exceeding Criteria: 52 (since 2005)

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 Column J Environmental medium for measurement reported in Column H, if applicable.

A Hazardous Substance	B CAS Number	C Maximum Concentration	D Sample Location for "C"	E Environmental Medium for "C"	F Distance to Property Boundary	G Direction of Migration	H Boundary Concentration	I Sample Location for "H"	J Environmental Medium for "H"
Ammonia	7664417	19,000	MW-11	Groundwater	500 feet	NW	890	MW-12	Groundwater
Acetone	1338363	2.5	KMW-6	Groundwater	900 feet	NW	ND	KMW-6	Groundwater
Benzene	71432	10	MW-5	Groundwater	1000 feet	NW	ND	KMW-6	Groundwater
Ethylbenzene	100414	88	MW-5	Groundwater	1000 feet	NW	ND	KMW-6	Groundwater
Methylene chloride	75092	11	MW-5	Groundwater	1000 feet	NW	ND	KMW-6	Groundwater
Naphthalene	91203	23	MW-5	Groundwater	1000 feet	NW	0.019	KMW-6	Groundwater
Xylenes	1330207	1000	MW-5	Groundwater	1000 feet	NW	ND	KMW-6	Groundwater

Total Number Samples Collected: 63 (since 2005)

Total Number of Samples Exceeding Criteria: 52 (since 2005)

A scaled map or drawing showing these locations and the property boundaries must be submitted with this Notice

